# EXHIBIT "A"

#### DAVIS POLK & WARDWELL

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July 20, 2006

Re: MDL-1629 -- In re Neurontin Marketing, Sales Practices and Products Liability Litigation

Mr. Jeffery N. Lüthi Clerk of the Panel Judicial Panel on Multidistrict Litigation Thurgood Marshall Federal Building One Columbus Circle, NE Room G-255, North Lobby Washington, D.C. 20002-8004

Dear Mr. Lüthi:

Pursuant to Panel Rule 7.5(e), Defendants Pfizer Inc. and Warner-Lambert Company LLC hereby notify and advise the Judicial Panel on Multidistrict Litigation (the "Panel") that the following actions, listed below, are potential tagalong actions in the above-captioned matter:

- 1) Blue Cross and Blue Shield of Alabama v. Pfizer, Inc. et al., No. 2:06-cv-00524-MEF-VPM, pending in the United States District Court for the Middle District of Alabama before United States District Judge Mark E. Fuller.
- 2) Jamie Fenelon v. Pfizer, Inc. et al., No. 1:06-cv-04136-JSR, pending in the United States District Court for the Southern District of New York before United States District Judge Jed S. Rakoff.
- 3) Patti Long v. Pfizer, Inc. et al., No. 1:06-cv-04285-JSR, pending in the United States District Court for the Southern District of New York before United States District Judge Jed S. Rakoff.

Mr. Jeffery N. Lüthi

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4) Amy Wendorf v. Pfizer, Inc. et al., No. 2:06-cv-00589-DWA, pending in the United States District Court for the Western District of Pennsylvania before United States District Judge Donetta W. Ambrose.

Under Panel Rule 1.1, the above actions contain common factual allegations similar to those in the twenty-seven actions transferred by the Panel on October 26, 2004 to the District Court of Massachusetts (MDL 1629).

Enclosed please find a courtesy copy of the above-mentioned actions as well as their docket sheets.

If you have any questions, please do not hesitate to call me.

Respectfully submitted,

James P. Rouhandeh

COUNSEL FOR PFIZER INC. AND WARNER-LAMBERT COMPANY LLC

#### **Enclosures**

cc w/o enc:

Counsel for Plaintiffs of Above-Noted Potential Tag-Along Actions (without enclosures; via U.S. Mail)

# BEFORE THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION

	X
IN RE NEURONTIN MARKETING, SALES PRACTICES AND PRODUCTS LIABILITY LITIGATION	: : : MDL DOCKET NO: 1629
	: x

# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on July 20, 2006, a true and correct copy of the July 20, 2006 Letter from Davis Polk & Wardwell, Counsel for Defendants in the Above-Captioned Action, to the Judicial Panel on Multidistrict Litigation noticing Tag-Along Actions was served upon the individuals on the attached Panel Attorney Service List by first class mail, postage prepaid.

By:

Deborah & Machegor
Deborah L. MacGregor

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#### SERVICE LIST

# In re Neurontin Marketing, Sales Practices and Products Liability Litigation (MDL Docket No. 1629)

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